

**Before the
FEDERAL COMMUNICATION COMMISSION
Washington, DC 20544**

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| In the Matter of |) | |
| |) | |
| Targeting and Eliminating Unlawful |) | |
| Text Messages |) | CG Docket No. 21-402 |
| |) | |
| Rules and Regulations Implementing the |) | |
| Telephone Consumer Protection Act of 1991 |) | CG Docket No. 02-278 |

REPLY COMMENTS OF 28 STATE ATTORNEYS GENERAL

I. INTRODUCTION

The undersigned State Attorneys General (“State AGs”) submit these Reply Comments in response to the Public Notice issued by the Consumer and Governmental Affairs Bureau,¹ seeking comment on the Federal Communication Commission’s (“Commission”) proposals to, *inter alia*, “ban the practice of obtaining a single consumer consent as grounds for delivering calls and text messages from multiple marketers on subjects beyond the scope of the original consent.”² Consistent with our respective and collective offices’ efforts in combatting illegal robocalls and text messages, and in response to those commenters advocating for measures that will provide lesser protection for consumers, the State AGs support the Commission’s intended goal of eliminating the current practices of the lead generation industry, unscrupulous voice service providers, and illegal robocallers that abuse the Commission’s rules governing prior express

¹ Further Notice of Proposed Rulemaking, Targeting and Eliminating Unlawful Text Messages, CG Docket No. 21-402, Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, CG Docket No. 02-278, March 16, 2023 (“March 2023 FNPRM”).

² March 2023 FNPRM at 22, ¶ 58.

written consent. In addition, the State AGs offer comments concerning the Commission's proposals with respect to text messaging.

II. PRIOR EXPRESS WRITTEN CONSENT

A. The Lead Generation Problem

Telemarketers, voice service providers, and scammers need people to call (or text). Thus, lead generation has proliferated into a billion-dollar industry³ and has become a necessary component of the robocall ecosystem. Most obviously, there is the person or entity interested in placing calls to potentially solicit customers for any number of products or services or to swindle consumers into parting with their hard-earned money or personal information. Whether for telemarketing or for scams, the entity that wants to place the calls needs to select the phone numbers to call, needs technology to dial the calls *en masse*, and needs a voice service provider to connect the calls to the recipients. Each of these necessary functions is routinely outsourced to providers all over the globe, who facilitate and profit from facilitating robocalls.

A few months into the global COVID-19 pandemic, Assurance IQ, LLC (“Assurance”), an insurance company, filed a petition with the Commission seeking an expedited ruling regarding what constitutes prior express consent under the Telephone Consumer Protection Act (“TCPA”).⁴ In its Petition, Assurance requested the Commission confirm that “where it is determined that a calling party has sufficient information to establish a reasonable basis to believe that they have

³ Lead generation involves collecting personal information, including telephone numbers, from consumers and then selling that information to third parties who want to use the leads to generate business. *See also* <https://www.statista.com/statistics/190328/us-online-lead-generation-spending-forecast-2010-to-2015/> (Accessed April 18, 2023).

⁴ Petition for Expedited Declaratory Ruling Regarding the Application of 47 U.S.C § 227(b)(1) of the Telephone Consumer Protection Act, CG Docket 02-278, May 12, 2020 (“Petition”).

valid consent to make the call, the caller may rely on that consent for TCPA purposes until such time as the called party claims to the caller that he or she did not provide the consent.”⁵ In its Petition, Assurance outlined its process for obtaining prior express consent from consumers, as follows:

Consumers seeking quotes through one of [Assurance’s] web sites...are first required to answer questions to provide information relevant to the formulation of a needs assessment. This information includes the customer’s name, telephone number...address, and [originating IP-address]...At the final step, in order to receive an online quote, the consumer sees, immediately above the submit or “get my quote” button, the statement, “By Clicking View My Quote, I agree to the below consents.” Adjacent to that button, the consumer sees the following:

By clicking 'View My Quote', I expressly consent by electronic signature to receive marketing communication, including via calls using an automatic telephone dialing system and artificial or pre-recorded messages, emails, and text messages (SMS), from insurance companies or their agents, the owner of this website and its agents, representatives and affiliates, and partner companies to the phone number provided (including any wireless numbers). I understand that my consent to receive communications in this manner is not required as a condition of purchasing any goods or services, my telephone company may impose charges for these contacts, and I can revoke my consent at any time. If you are Medicare-eligible a representative may call you about a Medicare Advantage plan, Medicare Prescription Drug plan, Medicare Supplement plan or other Medicare plans. Not affiliated with the United States Government or the federal Medicare program.

By clicking 'View My Quote', I further agree to receive SMS notifications from Assurance short code 71953. Message and data rates may apply. Message frequency varies. You may receive alerts until you choose to opt out of this service by texting "Stop" to 71953 or replying "Stop" to any of our messages. Text "Help" to 71953 for assistance. Terms and Conditions and Privacy Policy and Do Not Sell My Personal Information

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⁵ Petition at 1 (internal citation omitted).

⁶ Petition at 2-3.

Typically, a consumer is not required to click on the “partner companies” hyperlink, nor the hyperlinks for the “Terms and Conditions” or “Privacy Policy,” in order to click on the “View My Quote” button. If a discerning consumer clicks on the link for “partner companies,” Assurance redirects the consumer to a separate webpage,⁷ wherein Assurance lists over 2,100 company names.⁸ By simply requesting an insurance quote from Assurance via a web inquiry, Assurance has opened the floodgates for an unwitting consumer to receive thousands upon thousands of robocalls, emails, or text messages from not only Assurance and “its agents, representatives and affiliates” (whoever they are), but “other insurance companies or their agents” (whoever they are), as well as the 2,100+ companies.

In reviewing the list of Assurance “partner companies,” it is readily apparent that not all of these companies sell insurance products. Without performing an exhaustive internet search of all 2,100+ names, it appears that the list of partner companies includes businesses that sell automobile warranties or service contracts, solar panels, digital advertising, and debt relief services, to name a few. Interestingly enough, the list also appears to include lead generation and marketing companies, as well as companies with wholly generic names, such as ‘American,’ ‘Builders,’ ‘Electric,’ ‘Erie,’ ‘Fabric,’ ‘Facility,’ ‘Federal,’ ‘Inc.,’ and ‘LLC,’ to name a few. One can only speculate as to why such a list would contain such generic names.⁹

⁷ <https://assurance.com/tcpa-partner-companies> (accessed March 28, 2023).

⁸ See State AG Reply Comment - Exhibit 1, attached.

⁹ See *State of Ohio v. Aaron Michael Jones, et al.*, 2:22-cv-02700-ALM-KAJ (S.D. Oh. 2022), Complaint, 7/7/2022 at ¶ 69 (alleging that when a VoIP provider of an illegal robocaller had to respond to an ITG traceback request, the robocaller needed to “buy some time” before responding in order to add “auto services” language to the list of opt-in websites in the terms and conditions).

Assurance's business practice is not an anomaly. Telemarketers (and some voice service providers¹⁰) typically rely on the purported consent provided through data brokers, bots, or weblinks on websites. Various parties create marketing websites with consent forms and then sell the data (i.e., names and phone numbers) to intermediary 'aggregators,' who compile the lead data from multiple website publishers and then sell the data to other aggregators, and so on, until the telemarketers purchase the leads for solicitation purposes.¹¹ Multiple filers submitted comments into the record in response to Assurance's Petition, providing examples and greater explanation of these practices.¹²

¹⁰ See Order, *In the Matter of Urth Access, LLC*, File No. EB-TCD-22-00034232, December 8, 2022, at 6-7, ¶¶ 15-16 (Urth Access, a voice service provider sanctioned by the Commission, claimed, in response to a Traceback, that its customers obtained consent for student loan robocalls. Urth Access provided the Traceback group with purported consent logs that included website addresses through which the illegal robocallers captured the called party's consent. However, the Commission recognized that none of the websites had any connection to student loan assistance, but rather, concerned health insurance products/services. The Commission also recognized that the consent logs failed to provide adequate disclosure that would constitute valid consent, as required by the Commission's rules. The websites included TCPA consent disclosures whereby the consumer agreed to receive robocalls from "marketing partners." These marketing partners were only visible to the consumer if the consumer clicked on a specific hyperlink to a second website that contained the names of 5,329 entities.)

¹¹ See generally "Follow the Lead" Workshop, Staff Perspective (Sept. 2016) at [Staff Perspective: "Follow the Lead" workshop - September 2016 \(ftc.gov\)](#).

¹² See, e.g., Letter from Timothy J. Sostrin, Keogh Law, to Marlene Dortch, Federal Commc'ns Comm'n, CG Docket No. 02-278 (Aug. 12, 2020); Reply Comments of James Shelton in Opposition to Petition for Expedited Declaratory Ruling filed by Assurance IQ, LLC, CG Docket No. 02-278 (filed July 6, 2020); Reply Comments of Joe Shields on the Assurance IQ LL Petition for Expedited Declaratory Ruling, CG Docket No. 02-278 (filed July 6, 2020); Comments of ZipDX LLC, CG Docket No. 02-278 (filed May 28, 2020); Letter from National Consumer Law Center, et al. to Marlene Dortch, Federal Commc'ns Comm'n, CG Docket No. 02-278 (Aug. 12, 2020); Letter from National Consumer Law Center, et al. to Marlene Dortch, Federal Commc'ns Comm'n (Oct. 4, 2022).

B. The Commission’s Proposed Solution and Requests for Comment

In the March 2023 FNPRM, the Commission proposes to amend 47 C.F.R. Section 64.1200(f)(9) by adding the below-emphasized language to the current rule:

The term prior express written consent means an agreement, in writing, bearing the signature of the person called that clearly authorizes the seller to deliver or cause to be delivered to the person called advertisements or telemarketing messages using an automatic telephone dialing system or an artificial or prerecorded voice, and the telephone number to which the signatory authorizes such advertisements or telemarketing messages to be delivered.

Prior express written consent for a call or text may be to a single entity, or to multiple entities logically and topically associated. If the prior express written consent is to multiple entities, the entire list of entities to which the consumer is giving consent must be clearly and conspicuously displayed to the consumer at the time consent is requested. To be clearly and conspicuously displayed, the list must, at a minimum, be displayed on the same web page where the consumer gives consent.¹³

In addition to comments on the proposed language set forth above, and whether or not it will “clarify consent” or “help to eliminate illegal text messages and calls,” the Commission seeks comment on alternatives to the proposed language that would better protect consumers from the harms of illegal robocalls or text messages.¹⁴ The Commission also seeks comment on the principle that prior express consent to receive robocalls or text messages must be made directly to one entity at a time.¹⁵

The Commission additionally asks a series of questions regarding how its proposed new language would affect consumer use of comparison-shopping websites. First, it requests comments on how it can ensure consumers “can consent to obtain further information from the

¹³ March 2023 FNPRM at 34, Appendix C; compare 47 CFR § 64.1200(f)(9).

¹⁴ March 2023 FNPRM at 23, ¶¶ 61 and 62.

¹⁵ *Id.* at 23, ¶ 61.

site without receiving numerous calls and texts from unrelated companies.” Second, it requests that commenters discuss whether the new language would limit the value of comparison-shopping sites to consumers. Third, the Commission asks whether alternatives to the proposal exist that would better protect consumers from unwanted robocalls and texts that may result from use of comparison-shopping websites.¹⁶

The undersigned State AGs support the Commission’s consistent and long history of requiring that prior express written consent for telemarketing be directly between a specific consumer and one specific seller. Based upon our understanding of the TCPA, the Code of Federal Regulations (“Code”), and the Commission’s previous orders, there is no “lead generator loophole.” Rather, those who profit from the robocall ecosystem are ignoring established law.

As such, the State AGs respectfully suggest that in lieu of amending the current language of Section 64.1200(f)(9) as proposed, the Commission instead clarify that the existing requirements for prior express written consent to receive robocalls and texts are in line with the principle that such consent must be made directly to one entity at a time. By doing so, the Commission will better protect consumers and avoid likely disputes over interpretation of the term “logically and topically associated.”

The State AGs also believe that contrary to the opening comments offered by members of the telemarketing industry, the Commission’s proposed new language permitting consumer consent to apply to more than one seller at a time is not necessary for consumers to continue to enjoy the benefits of comparison-shopping websites. Rather, as addressed in Section C (iii) below, within the structure of the current rule, these websites can make slight shifts to how information is

¹⁶ *Id.*

displayed in a way that continues to provide consumers the benefit of comparison, without subjecting them to unwanted robocalls and texts.

C. Discussion

(i) The Current Rules Require Consent to One Seller at a Time

In 1991, Congress passed the TCPA to address consumer outrage “over the proliferation of intrusive, nuisance calls to their homes from telemarketers.”¹⁷ The TCPA provides that it is unlawful to make certain calls and texts¹⁸ using an automatic telephone dialing system¹⁹ or an artificial or prerecorded voice.²⁰ In addition, the TCPA vests the Commission with authority to promulgate rules to implement this prohibition.²¹ Pursuant to this authority, the Commission determined that autodialed, prerecorded, or artificially voiced calls that introduce an advertisement or constitute telemarketing are illegal unless the called party has given “prior express written consent” to be called.²²

The Code provides that the called party must provide permission to the seller. The Code defines “Seller” as “the person or entity on whose behalf a telephone call or message is initiated for the purpose of encouraging the purchase or rental of, or investment in, property, goods, or

¹⁷ Public Law 102-243, 105 Stat 2394 (Dec. 20, 1991) at Section 2 (6).

¹⁸ In 2003, the Commission clarified that “calls” include text messages to wireless numbers. 2003 TCPA Order, 18 FCC Record at 14115, para. 165.

¹⁹ In *Facebook v. Duguid*, 141 S.Ct. 1163, 1171 (2021), the Supreme Court clarified that “a necessary feature of an autodialer under § 227(a)(1)(A) is the capacity to use a random or sequential number generator to either store or produce phone numbers to be called.”

²⁰ See 47 U.S.C. § 227(b)(1)(A) and (B).

²¹ 47 U.S.C. 227(b)(2).

²² 47 C.F.R. 64.1200(a)(2).

services, which is transmitted to any person.”²³ Furthermore, the Code defines “prior express written consent,” in relevant part, as “an agreement, in writing, bearing the signature of the person called *that clearly authorizes the seller to deliver or cause to be delivered to the person called advertisements or telemarketing messages* using...an artificial or prerecorded voice... .”²⁴ Hence, for advertising and telemarketing robocalls, the Code establishes that there must be express written consent *by the called party to the seller*.

Next, the Code delineates the requirements for the written agreement as follows:

- (i) The written agreement shall include a *clear and conspicuous disclosure* informing the person signing that:
 - (A) By executing the agreement, *such person authorizes the seller* to deliver or cause to be delivered to the signatory telemarketing calls using an automatic telephone dialing system or an artificial or prerecorded voice ...²⁵

Courts interpret “clear and conspicuous” to mean a notice that would be apparent to the reasonable consumer, separate from advertising copy or other disclosures.²⁶

The plain language of the existing rules makes clear that the Commission already intended for consent under the TCPA to be directly between a specific consumer and a specific seller. The Commission’s orders adopting these rules confirm this interpretation. For example, in 1995, in one of the first Commission orders implementing the TCPA, the Commission observed that

²³ 47 C.F.R. §64.1200(f)(10).

²⁴ 47 C.F.R. § 64.1200(f)(9) (emphasis added).

²⁵ *Id.* (emphasis added).

²⁶ *See Lundbom v. Schwan’s Home Service, Inc.*, 2020 WL 2736419 (D. Or. 2020); *Satterfield v. Simon & Schuster, Inc.*, 569 F.3d 946, 954-955 (9th Cir. 2009); *Karpilovsky v. All Web Leads, Inc.*, No 17 C 1307, 2018 WL 3108884, *5 (N.D. Ill. 2018).

although the statute does not define “express permission” or “invitation” from a consumer to permit telemarketing calls, Congress did not intend to allow telephone solicitation calls unless the called party (a) clearly stated that the telemarketer may call, and (b) clearly expressed an understanding that the telemarketer’s subsequent calls will be made for the purpose of encouraging the purchase of goods or services.²⁷

Also, in its 2012 TCPA Order,²⁸ the Commission declared it would “maximize consistency with the Federal Trade Commission’s (“FTC”) analogous Telemarketing Sales Rule (“TSR”)”²⁹ by adopting its current rules on consent:

Consistent with the FTC’s TSR, [the Commission concludes] that a consumer’s written consent to receive telemarketing robocalls must be signed and sufficient to show that the consumer: (1) received ‘clear and conspicuous disclosure’ of the consequences of providing the requested consent, i.e., that ***the consumer will receive future calls that deliver prerecorded messages by or on behalf of a specific seller***; and (2) having received this information, agrees unambiguously to receive such calls at a telephone number the consumer designates.³⁰

²⁷ In the Matter of Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, Memorandum Opinion and Order, 10 FCC Record 12391, 12396 (Aug. 1995) at ¶11 (emphasis added).

²⁸ Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, CG Docket No. 02-278, 27 FCC Record 1830, February 15, 2012 (“2012 TCPA Order”).
https://docs.fcc.gov/public/attachments/FCC-12-21A1_Rcd.pdf

²⁹ 2012 TCPA Order, at 1831, ¶ 1.

³⁰ *Id.* at 1844, ¶ 33 (emphasis added).

The TSR also requires the seller to obtain prior express consent from the called party.³¹ When the FTC amended the TSR in 2008 to prohibit telemarketing calls delivering prerecorded messages without a consumer's express written agreement to receive such calls, the FTC responded to consumer comments expressing concern for their contact information being shared with affiliates or other companies. The FTC unequivocally stated that a "consumer's agreement with a seller to receive calls delivering prerecorded messages is *non-transferrable*. Any party *other than that particular seller* must negotiate its own agreement with the consumer to accept calls delivering prerecorded messages. Prerecorded calls placed to a consumer on the [National DNC Registry] by some third party that *does not have its own agreement* with the consumer would violate the TSR."³² Like the amended TSR, the TCPA and the Code allow sellers and telemarketers to call any person whose number has been entered on the National DNC Registry if that person has given his or her "prior express invitation or permission" to call, in writing and signed.³³ Consequently, the so-called "loophole" is just a figment of the lead generation industry's

³¹ See 16 C.F.R. § 310.4(b)(1)(v)(A) (in order to initiate any outbound telephone calls that deliver prerecorded messages to induce the purchase of goods or services, *the seller must obtain an express, written agreement from the called party*).

³² See Federal Register, Vol. 73, No. 169, August 29, 2008, at 51182 (emphasis added); <https://www.ftc.gov/business-guidance/resources/complying-telemarketing-sales-rule#prerecordedmessages>. ("**Does a consumer's written agreement to receive prerecorded message calls from a seller permit others, such as the seller's affiliates or marketing partners, to place such calls?** No. The TSR requires that the written agreement identify the single "specific seller" authorized to deliver prerecorded messages. The authorization does not extend to other sellers, such as affiliates, marketing partners, or others. **May a seller obtain a consumer's written permission to receive prerecorded messages from a third-party, such as a lead generator?** No. The TSR requires the seller to obtain permission directly from the recipient of the call. The seller cannot rely on third parties to obtain permission.")

³³ 47 CFR 1200(c)(2)(ii) (emphasis added); see also, *Report to Congress Pursuant to the Do No Call Implementation Act on Regulatory Coordination in Federal Telemarketing Laws Submitted by The Federal Trade Commission* at 19 ("Like the amended TSR, the revised TCPA Regulations allow sellers and telemarketers to call any person whose number has been entered on the National Do Not Call Registry if that person has given his or her 'prior express invitation or permission' to call, in writing and signed.").

collective imagination. The State AGs respectfully submit that consent under the TCPA is between one specific consumer and one specific seller.

In 2015, the Commission further put the consumer in command by clarifying that “a called party may revoke consent at any time and through any reasonable means. A caller may not limit the manner in which revocation may occur.”³⁴ To allow third parties to gather consent would effectively limit the manner in which consumers who seek to revoke consent can do so. Consumers would be forced to first receive robocalls from a seller and then revoke consent individually to each seller. Third-party lead generators that gather consent for multiple sellers do not generally maintain a relationship with the sellers past the sale of consumer consent data, and thus, they cannot reliably transmit a revocation of consent from a consumer.

As a result, if a consumer initially consents to receive robocalls through a third-party lead generator, or if fabricated consent is fraudulently provided to a third-party lead generator, then the consumer cannot subsequently revoke consent through the lead generator and is likely to receive an ongoing barrage of robocalls from sellers who purchase the consumer’s information. Consumers who, for example, wish to receive information on mortgage rates do not need or desire mortgage related solicitations in perpetuity. Rather, in most instances, the consumer will either refinance or purchase a home, or they will change their mind after some time and no longer wish to receive solicitations.

However, when third-party lead generators collect and sell a consumer’s consent, the consumer cannot effectively revoke consent after the consumer’s need for mortgage information has passed. Rather, each time the lead generator sells the consumer’s information, and a seller

³⁴ Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991; American Association of Healthcare Administrative Management, Petition for Expedited Declaratory Ruling and Exemption; et al, FCC 15-72, ¶ 48. https://docs.fcc.gov/public/attachments/FCC-15-72A1_Rcd.pdf.

calls, the consumer must answer the unwanted robocall and revoke consent to the individual seller. This is another important reason why the Commission's rules should not be amended to permit web-based consent from one consumer to apply to multiple sellers, even sellers of logically or topically related services.

The March 2023 FNPRM suggests a clear line in the sand in its proposal to “ban the practice of obtaining a single consumer consent as grounds for delivering calls and text messages from multiple marketers on subjects beyond the scope of the original consent.” However, the State AGs respectfully submit that the Commission's proposed solution will not achieve this result. Under the Commission's proposed amendments, multiple entities would be legally permitted to rely on the consent provided to another, totally separate entity. Instead of hyperlinks to separate websites, it is likely that hundreds, if not thousands, of so-called ‘marketing partner’ names will be crammed onto consent pages. Sellers, telemarketers, and voice service providers will most likely declare such practice is ‘clear and conspicuous’ because all the consumer has to do to see the fine print is to click on the magnifying glass icon to increase the size of the font on the computer screen.

In summary, the proposed amendment in Appendix C of the March 2023 FNPRM will not achieve the intended purpose, but it will open doors to new tricks and gimmicks. Instead, the Commission should simply clarify and reiterate that consent under the TCPA is between one specific consumer and one specific seller. If another seller wants consent to send robocalls to that consumer, then that other seller should independently obtain consent—no more hyperlinks, no more ‘marketing partners,’ and no more confusion.

(ii) **The Commission Should Confirm Compliance with the Federal E-Sign Act**

The Code also requires the written consent for telemarketing to comply with the federal Electronic Signatures in Global and National Commerce Act (“E-Sign Act”).³⁵ The Code states that the called party’s “signature shall include an electronic or digital form of signature, to the extent that such form of signature is recognized as a valid signature under applicable federal law or state contract law.”³⁶ The E-Sign Act enables the validity and enforceability of electronic signatures. Pursuant to the E-Sign Act, an “electronic signature means an electronic sound, symbol, or process, attached to or logically associated with a contract or other record and executed or adopted by a person with the intent to sign the record.”³⁷

Hence, basic E-Sign law requires that for every agreement made electronically, there be four separate elements to constitute consent: (1) an electronic sound or process, such as the click of a mouse; (2) that is attached to or logically associated with a contract or agreement; (3) executed or adopted by the person; (4) with the intent to sign the agreement. Simply put, one cannot intend to sign an agreement when one does not know what the agreement is. Consequently, extending permission for telemarketing to entities and for services that are not specifically identified on the webpage where the consumer clicks to give permission to a specific seller does not provide the requisite intent.

In the Commission’s 2012 TCPA Order, the Commission concluded that “consent obtained in compliance with the E-Sign Act will satisfy the requirements of its revised rule, including permission obtained via an email, website form, text message, telephone keypress, or voice

³⁵ 15 U.S.C. § 7001, *et seq.*

³⁶ 47 C.F.R. § 64.1200(f)(9)(ii).

³⁷ 15 U.S.C. § 7006(5).

recording.”³⁸ The Commission further concluded that “[a]llowing documentation of written consent under the E-Sign Act [would] minimize the costs and burdens of acquiring prior express written consent for autodialed or prerecorded telemarketing calls while protecting the privacy interests of consumers.”³⁹

In addition to restricting prior written consent for telemarketing to one specific seller, current Commission rules require the consent to be in writing and comply with federal E-Sign Act requirements. Accordingly, the undersigned State AGs request that the Commission reiterate that practices such as those employed by Assurance, as described above, violate Commission rules. Claims by “marketing partners” (listed on a separate webpage or website) that a consumer’s mouse click provided valid written consent for telemarketing are invalid. Moreover, because the E-Sign Act requires that the agreement be presented in writing,⁴⁰ there is no authority for concocting oral consent during a robocall.⁴¹

(iii) Reaffirming that the Current Rule Already Requires One Consent to One Seller at a Time Will Not Limit the Value of Comparison- Shopping Sites to Consumers.

As mentioned above, the Commission also requested the following input concerning its proposed modification of its rule regarding preexisting consumer consent to telemarketing calls and texts to allow one consent to apply to multiple sellers:

Consumers may find comparison shopping websites helpful; how can we ensure that they can consent to obtain further information from the site without receiving numerous calls and texts from unrelated companies? Commenters should discuss whether our

³⁸ Small Entity Compliance Guide, CG Docket No. 02-278, May 13, 2013 (“FCC Compliance Guide”), at p. 4; *citing* 2012 TCPA Order at 27 FCC Record 1830, 1844, ¶ 34.

³⁹ FCC Compliance Guide, at 4.

⁴⁰ 15 U.S.C. § 7001(c)(1).

⁴¹ 15 U.S.C. § 7001(c)(6).

proposal would limit the value of comparison-shopping sites to consumers.⁴²

In the opening comment period, several commenters that support or operate comparison-shopping websites supported modifying the rule to expand consent to multiple sellers, arguing that requiring one consent per consumer would reduce access to and increase the cost of credit, deprive consumers of choice, and stifle competition.⁴³ For example, Lending Tree represents:

[The] proposal will harm consumers, consumer welfare, and the competition that comparison-shopping websites promote among multiple providers and sellers. Such a limitation undermines the very reason that a consumer seeks out and visits a comparison-shopping website, which is to obtain simultaneous offers from multiple, competing sellers and providers, rather than having to shop from seller to seller on their own.”⁴⁴

Similarly, Drips, which describes itself as a “conversational outreach platform that helps compliant businesses set appointments with consumers who have existing business relationships or provided written consent to be contacted for specific purposes,”⁴⁵ claims:

Suggesting that consent should only be able to be made in a 1:1 fashion is an oversimplification to a nuanced problem. This would effectively kill all comparison-shopping websites, consumer choice, and online marketplaces as we know it.⁴⁶

⁴² March 2023 FNPRM at 23, ¶61.

⁴³ See e.g., Comments of Lending Tree, LLC, CG Docket No. 02-278 (May 8, 2023) (“Lending Tree Comments”); Letter from Drips, CG Docket No. 02-278 (May 8, 2023) (“Drips Letter”); Letter from Online Lenders Alliance, CG Docket No. 02-278 (May 8, 2023).

⁴⁴ Lending Tree Comments at 12.

⁴⁵ Drips Letter at 1.

⁴⁶ *Id.* at 3.

The State AGs disagree that enforcing the existing rule would harm consumer welfare and “effectively kill all comparison-shopping websites.” Comparison-shopping websites such as Lending Tree provide a service to consumers by gathering potential credit options in one place, but they do not perform a hard credit pull and do not provide firm offers of credit. As a result, consent is not necessary for their services to be offered and any related benefit to be rendered. Rather, consumers could use these services and then select the lender or lenders they wish to hear from individually. It is not necessary that a consumer be required to agree to receive robocalls or robotexts from multiple, potentially hundreds of other lenders in order for them to access the services of comparison-shopping websites.

Indeed, it is permissible under the current rules for a comparison-shopping site to collect express consent from individual sellers for telemarketing calls or texts on their websites. The website simply must clearly and conspicuously disclose the names of the sellers that may contact the consumer and ask the consumer to consent specifically to each seller from which they agree to receive calls or texts. The current rule does not prevent sellers from obtaining express consent. Therefore, the current rule does not undercut the business model insofar as that model relies on sellers obtaining specific consent from a consumer on a one-by-one basis.

In short, enforcing the rules to require pre-existing written consent to call or text a consumer for purposes of telemarketing from one consumer to one seller at a time will not reduce consumer access to credit, deprive consumers of choice, or stifle competition in the comparison-shopping industry. Rather, enforcing the current rule better protects consumers by requiring that they proactively consent to receiving further information from other companies. The State AGs therefore ask the Commission to reject commenter claims that enforcing the current rule would impair the value of comparison-shopping sites to consumers.

III. TEXT MESSAGES

A. The Illegal Text Problem

With the advent of mobile phones, the speed and the ease with which we communicate with others has increased exponentially. This increased speed creates circumstances that make consumers more vulnerable to robotext fraud. Consumers rely upon their mobile phones to receive communications that are characteristically short, but often important. As such, it is easier for bad actors to disguise their identities through a text message, in comparison to an illegal robocall or phishing e-mail. During a phone call or while reading an e-mail, the would-be victim has additional time to identify the scam, whereas this is not so with a short text message containing a malicious link. Simply by tapping (inadvertently or purposefully) the link in a text, consumers may expose their phones to malware and viruses. Given the amount of personal information contained on our cellular phones, the potential financial and personal privacy harms are vast.

The evidence already before the Commission supports a need to enact effective rules to address the continuing threat scam robotexts pose to consumers. As the Commission recognized, the number of spam text messages that wireless providers blocked grew ten times, from an estimated 1.4 billion in 2015 to 14 billion in 2020.⁴⁷ In addition, consumers have reported \$231 million in losses from text message scams in the first three quarters of 2022, which is greater than the losses reported in 2020 and 2021 combined.⁴⁸

⁴⁷ March 2023 FNPRM at 3, ¶ 6.

⁴⁸ *Id.* at 4, ¶ 6.

To curb the onslaught of illegal robotexts, the Commission seeks comment on whether it should adopt processes similar to those in place for illegal robocalls. Specifically, the Commission proposes, *inter alia*, to require terminating providers to block texts from a sender after the providers are on notice from the Commission that the sender is sending illegal texts, and to extend the National Do-Not-Call (“DNC”) Registry’s protections to text messages.⁴⁹ The State AGs commend the Commission’s attention to the particular issue of illegal robotexts, distinct from the issue of illegal robocalls, and support the Commission’s efforts to review, clarify, and refine rules that aim to enhance protections for consumers and honor their requests not to be bombarded by illegal robotexts.

B. Blocking Texts upon Commission Notification

In the March 2023 FNPRM, the Commission proposes to “require terminating mobile wireless providers to investigate and potentially block texts from a sender after they are on notice from the Commission that the sender is transmitting suspected illegal texts, similar to [the Commission’s] requirement for gateway providers with respect to voice calls.”⁵⁰ Based on the Commission’s proposal, the State AGs presume that the Commission’s Enforcement Bureau would issue an official notice of suspected illegal texts to a terminating mobile wireless provider (“terminating provider”).⁵¹ The terminating provider would then promptly investigate the identified text(s) and either block the texts and substantially similar texts on an ongoing basis or

⁴⁹ *Id.* at 3, ¶ 4.

⁵⁰ *Id.* at 20, ¶ 50.

⁵¹ *Id.* at 20, ¶ 52.

respond to the Commission that the terminating provider has a reasonable basis for concluding that the identified texts are not illegal.⁵²

To begin, the State AGs support the principle that all entities in the wireless messaging ecosystem have an obligation to do their part to preserve the trust in, and utility of, messaging services.⁵³ This includes those providers who ultimately deliver illegal texts to consumers. However, because State AGs, along with the Commission, also understand that the messaging and voice ecosystems each have significantly different infrastructures,⁵⁴ we are mindful that comparable success in mitigating illegal robotexts may not precisely align with the playbook that has been so effectively devised and refined by the Commission to mitigate illegal robocalls.

Therefore, to the extent that the Commission has determined that extending the robocall blocking protocols to robotexts will actually bring a measurable benefit to consumers across the country in preventing fraud, the State AGs support such a proposal. The State AGs further urge the Commission to continue exploring ways in which rules specific to the unique infrastructure, players, and technology of messaging and robotexting can be proposed and deployed to effectively and efficiently mitigate the continuing, burgeoning threat targeting our consumers.

⁵² *Id.*

⁵³ See CTIA, *Messaging Principles and Best Practices*, <https://www.ctia.org/the-wireless-industry/industry-commitments/messaging-interoperability-sms-mms> (last visited May 2, 2023) (enumerating a set of voluntary best practices developed in July 2019 by CTIA, the messaging industry association, and its member companies throughout the wireless messaging ecosystem).

⁵⁴ Reply Comments of Fifty-One (51) State Attorneys General, Targeting and Eliminating Unlawful Text Messages at 4, CG Docket No. 21-402 (Dec. 9, 2022).

C. Clarifying Do-Not-Call Protections for Text Messages

To the extent that it may be unclear, the Commission proposes to “clarify that the National DNC Registry protections apply to text messages as well as voice calls and to codify this clarification in [the Commission’s] rules.”⁵⁵ Previously, the Commission has stated that “text messages” are “calls” for TCPA purposes and has taken the position that the National DNC Registry protects consumers from unwanted marketing text messages.⁵⁶ However, the Commission has not explicitly included text messages in the codified DNC rules.⁵⁷

As the Commission recognized, the National DNC Registry has been operational for almost twenty years and currently protects over 246 million telephone numbers from telemarketing sales calls.⁵⁸ As with our respective state DNC registries, the National DNC Registry is popular among consumers, as it provides a means through which consumers can exercise a modicum of control over the marketing telecommunications they choose to receive.

The State AGs support the Commission’s proposal to clarify that the National DNC Registry protections will apply to marketing text messages. Such clarification is a common-sense approach to eliminate any potential confusion in the industry and has the added benefit of providing protection to consumers regardless of whether the texting party utilizes an autodialer.⁵⁹

⁵⁵ March 2023 FNPRM at 21, ¶ 55.

⁵⁶ *Id.*

⁵⁷ *Id.*

⁵⁸ *Id.*

⁵⁹ *Id.* at 22, ¶ 57.

IV. CONCLUSION

The undersigned State AGs thank the Commission for the opportunity to present these comments in this proceeding and reaffirm our commitment to work with the Commission in combatting illegal robocalls and text messages. We respectfully urge the Commission to take this opportunity to shut down these unreliable and illegal methods of purportedly obtaining consent from consumers for marketing robocalls and texts. To that end, the State AGs recommend the Commission issue an Order that clarifies and confirms that its existing rules concerning “prior express written consent” contemplate consent between a specific consumer and one specific seller. This measure, as well as the other recommended measures set forth above, will ultimately better protect consumers from unwanted robocalls and text messages, which is a goal that the Commission and the State AGs collectively share.

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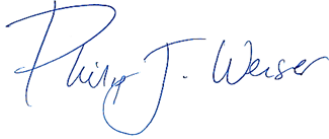
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Attorney General of Maryland



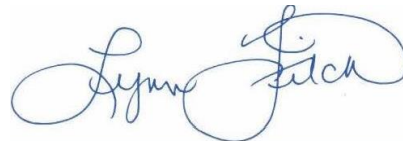
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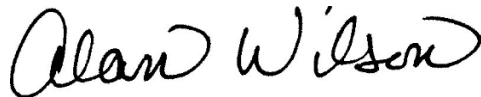
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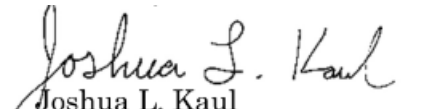
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Attorney General of Washington



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Attorney General of Wisconsin



Bridget Hill, Attorney General

Attorney General of Wyoming

State AG Reply Comment – Exhibit 1

| | |
|------------------------------------|--|
| 1st Century | AIB |
| 21st Century | AIG |
| 21st Century Insurance | AIG Direct |
| 2insure4less | AIO |
| 5 Star Auto Protection | AIP |
| 7Made Media | AIS |
| AAA Auto Warranty | AIU |
| AAA Insurance Co. | AIU Insurance |
| AA Auto Protect | Alfa Insurance |
| AABCO | Alfonzo Insurance Allstate Agency |
| AA Media Inc | Aliera Healthcare |
| AARP | All Access Health Insurance |
| ABCLeads | All American Health Agency |
| A&B Insurance and Financial | Allcare United |
| Abrazo Health | Allcare United LLC |
| Absolute Health Agents | AllDigitalPromotions |
| ACA Express | All Digital Promotions |
| Acceptance | Allegiant Group |
| Acceptance Insurance | Alliance |
| Access Insurance | Alliance 321 |
| AccordantMedia | Alliance and Associates |
| Accuquote | Alliance & Associates |
| ACE Global Marketing LLC | Alliance Insurance |
| ACE Solutions | Alliance National Health |
| Acme | Allianz |
| Acordia | Allied |
| Acquisition Tech | Allied Health |
| Acquisition Technologies | Allied Health Insurance Associates |
| ACSC | Allied Health Insurance Associates LLC |
| Adexec Services | Allied Insurance |
| Admaric Insurance Agency | Allied Insurance Partners |
| AdMediary | Allina Health |
| Admiral Life | All Nation |
| AdoptAContractor | All Risk |
| Adrea Rubin | Allstate |
| Adrian Adams Agency | Allstate County Mutual |
| Adsparkx Digital | Allstate Indemnity |
| ADT | Allstate Insurance |
| ADT Solar | AllWebLeads |
| Advance Consultants LLC | All Web Leads |
| Advanced Vehicle Protection Center | Alpha Benefits Center |
| Advantra | Alphatech Resource Holdings s.r.o |
| Advocate Health | Alpine Digital Group, Inc. |
| Advocator Group | America Auto Care |
| Aegis First | America Direct |
| Aegis Security | American |
| Aegon US Holding Corp. | American Adventure Insurance |
| Aetna | American Alliance |
| A & E Vehicle Services | American Automobile Insurance |
| Affinity Health Plan | American Automotive Alliance, LLC |
| Affirmative | American Banks |
| Affordable Healthcare Partners | American Benefits |
| Affordable Health Insurance Group | American Benefits Group |
| Affordable Insurance Group Inc. | American Casualty |
| Affordable Senior Health Solutions | American Commerce Insurance Company |
| AFLAC | American Continental |
| AGA | American Deposit Insurance |
| Agency Incline | American Direct Business Insurance |
| AgentCubed Marketplace | American Economy |
| Agent Insider | American Empire Insurance |
| Agent Marketing Partners | American Family |
| Agentra Healthcare | American Family Insurance |
| AHCP | American Family Mutual |
| AHH | American Fidelity Corp. |
| AHIA | American Financial |
| AHIX | American General |

American Health & Life Associates
 American Health Marketplace
 American Health Plans
 American Health Reform Solutions
 American Health Solutions
 American Health Underwriters
 American Home Assurance
 American Income Life
 American Income Life Insurance Company
 American Income Life Insurance Company Family
 American Insurance
 American Insurance Agencies
 American Insurance Agencies Direct
 American Insurance Agencies Direct Inc.
 American Insurance Company
 American Insurance Organization
 American Insurance Organization, LLC
 American International
 American International Ins
 American International Pacific
 American International South
 American Life & Health
 American Manufacturers
 American Mayflower Insurance
 American Motorists Insurance
 American National
 American National Insurance
 American National Insurance Co
 American National Property and Casualty
 American Premier
 American Premier Insurance
 American Protection Insurance
 American Reliable
 American Republic
 American Republic Insurance Co.
 American Savers Plan
 American Security Insurance Company
 American Select
 American Select Health
 American Senior Med
 American Service Insurance Agency
 American Skyline Insurance Company
 American Spirit Insurance
 American Standard
 American Standard Insurance - OH
 American Standard Insurance - WI
 American States
 American Workers Insurance Services
 Americare
 Americare/American Enterprise
 Americare Group
 America's Health Advisors
 Americas Health Brokers
 America's Health Care Plan
 Americas Health Group
 America's Insurance
 America's Moneyline, Inc.
 America's Trust
 America's Trust, Inc.
 AmeriChoice
 Americo
 Amerigroup
 AmeriHealth
 Amerilife
 AmeriLife Group, LLC
 Amerilife Marketing Group, LLC
 AmeriPlan
 Ameriprise
 Ameriprise Financial Group

Ameriquote
 AmeriSave
 Amerisure
 Amica
 Amica Insurance
 AmOne
 Angelic Marketing Group
 Angelic Marketing Group, LLC
 Anheo Insurance Solutions LLC
 Anheo Insurance Solutions LLC.
 ANPAC
 Answer Financial
 Anthem
 Anthem BCBS
 Anthem / BCBS
 AON
 Aon Corp.
 APEX Health Plans
 API
 Apliant
 Apollo Insurance Group
 Apollo Interactive
 Applied General
 Aragon Advertising
 Aragon Advertising LLC
 Arbella
 Ardent Health Services
 Arizona General
 Armed Forces Insurance
 Arrowhead
 Arrowstar Insurance Center
 Art Institute
 Assigned Risk
 Associated Indemnity
 Associated Insurance Managers
 Assurance IQ, Inc.
 Assurant
 Assured Benefits Direct
 Assured Health Group LLC
 Assured Life
 Assure Media
 Astonish
 Astoria Company
 Atlanta Casualty
 Atlanta Specialty
 Atlantic Auto Protection
 Atlantic Blue Media
 Atlantic Health
 Atlantic Health Advisors
 Atlantic Indemnity
 Atlantis
 Atlantis Health Group
 Atomic Leads
 Atreus Medicare Group
 Austin Mutual
 AutoCarenow.com
 Auto Club Insurance Company
 Auto Insurance Guide
 Automobile Association of America
 Automobile Club of Southern California
 Auto Owners
 Auto Protection 1
 Auto Protection Club
 Auto Repair Network
 Auto Repair Protection Services
 Auto Service Center
 Auto Warranty Savings Center
 Avendia
 Avendia Management

Avenge Digital
Aviva
Avmed
AvMed Inc.
Avomark
AXA
AXA Advisors
AXAD Capital
AXA Insurance Group
Badger Mutual
Balanced Life Agency
Banker's Fidelity
Bankers Hill Insurance
Bankers Life and Casualty
Bankers & Shippers
Bankrate
Bankrate, Inc.
Bankrate Insurance
Banner Life
Bantam Connect
Bartleson Brokers
Bayside
BRRS Group
BCBS
BCBS of Alabama
BCBS of Florida
BCBS of Michigan
BC Group LLC
BE Marketing Solutions Inc.
Benefit Advisors
Benefit Mall
Benefit United LLC
Benepath
Bennett FMO
Bennett Insurance Agency
Best Agency USA
Best Health Options
Best Insurance Group
Bestow
Better Health Alternatives
Better Living Health Services
Better Mortgage Corporation
Beyond Finance, DBA Accredited Debt Relief
BH Insurance Solutions, LLC
Bianco
Black Optek
Blueberry
Blue Choice
Blue Cross
Blue Cross - Anthem
Blue Cross Blue Shield
Blue Cross/Blue Shield Association Companies
Blue Cross of South Carolina
Blue Ink Digital
Bluensure Insurance
Blue Nsure Insurance
Blue Shield of California
Blue Summit
Blue Summit Insurance Solutions
Blue Wing Ads
BMP Insurance
Bold Media Group
Bolt
Bonneville
Boost
Boost Health
Boost Health Insurance
Boston Old Colony
Bravo Health

BridgeNet
BridgeNet Insurance
Bright Health Plan
Bright Health Solutions
Bright Idea Insurance Solutions, Inc.
Brightway
Bristolwest
Bristol West
Brokers Alliance
Brooke Franchise Corporation
Brooke Insurance
Brookstone Financial
BRXTN Digital Media
Budget Family Insurance
Builders
Burial Expense
c0aster
Cal Farm Insurance
Caliber Health Solutions
Caliber Home Loans
Caliber Home Loans, Inc.
California Casualty
California State Automobile Association
Call4SeniorSavings.com
Call Blade
CallCore
CallCore Media
Call Lead Solutions
Call Trader
Call Trader LLC
Cambia
Camden
CAN
CancerInsurance.com
Candid Maven
Capital Auto Protection
Capital Choice
Capital District Physicians Health Plan
Capital Health Advisors Inc.
Capital Health Insurance of America
Carchex
Cardinal Financial Company, Limited Partnership
Care Entrée
CareMore
Caresource
CareZone
Carezone Inc.
CareZone Insurance Services
CarGuard Administration
Carle Clinic Association
Carriers and partner companies include
CarShield
Cascade National Ins
Casualty Assurance
Catholic Financial Life
CDPHP
CDX Consultants
CEGE
Cege Media
Cekirk Insurance
Celtic Insurance
Centene
Centene Corp.
Centennial
Central Bank
Century Benefits
Century Insurance
Certainty Auto Protection
Channel Blend

Charter Oak
 Chase Insurance Group
 Cherry Blitz
 Chesapeake
 Chicago Insurance
 Choice Direct
 Choice Health
 Choice Insurance
 Choice One Health
 Choice One Health & Life Agency
 Choice Right LLC
 Christian Fidelity
 Chubb
 Church Mutual
 Cigna
 CIQ
 Citation Insurance Company
 Citigroup
 Citizens
 Citizens Disability
 Clarendon American Insurance
 Clarendon National Insurance
 Clean Energy Concepts
 Clear Choice Health
 Clearcover
 ClearLink
 Clear One
 Click 2 Call Network
 Clicks and Clients
 Client Consent Medicare
 Cloverleaf
 CMG Solutions
 CNA Insurance
 Coastline Insurance Advisors LLC
 CO Farm Bureau
 Colby Direct
 Colonial
 Colonial Insurance
 Colonial Penn
 Combined
 Comfortcare Insurance Group
 Comfort Care Insurance Group
 ComfortCare Insurance Group
 Commerce West Insurance Company
 Commercial Insurance Center
 CommercialInsurance.net
 Commercial Marketing Group
 Commercial Union
 Commonwealth
 Communicating for America
 CommunityCare
 Community Care
 Compare.com
 CompareInsuranceQuotes
 Compare Insurance Quotes
 Comparenow
 Comparequotes
 Comparison Market
 Complete Car
 Complete Healthcare Direct, LLC
 Confie
 Connect Health Insurance
 Connect Health Insuranceli>
 ConnectiCare
 Connect Insurance Brands
 Connect Life Plans
 Connect Life Plansli>
 Connect Medicare Advantage
 Connect Medicare Advantageli>

Connect Medicare Supplement
 Connect Medicare Supplementli>
 Connect One Health
 Connect Plus
 Conseco Life
 Consumer Advocacy LLC
 Consumer United
 Contactability
 Continental Casualty
 Continental Divide Insurance
 Continental Insurance
 Continental Life
 Conventry
 Core Healthcare Solutions
 Core Health Solutions
 Corner Shop Media
 Corner Stone Media
 COTO INDUSTRIES LLC
 Cotton States Insurance
 Cottonwood
 Countershot Media
 Country Companies
 Country Financial
 Country Insurance and Financial Services
 Countrywide Insurance
 Couvillier Advisors
 Coventry
 Coventry Health Care
 Coverage Choice LLC
 Coverage One
 Coverage One Insurance
 Coverage One Insurance Group LLC
 Coverage One Insurance Group, LLC
 Coverance Insurance Solutions
 Coverdell
 CoverHound
 Covida
 CPA Data Solutions LLC
 Creative Emarketing
 Creative Intellects
 Credible Operations, Inc
 Credit Union
 Crisp-Results
 Criterion
 Crosspointe
 Crosspointe Insurance and Financial Services LLC
 Crosspointe Insurance & Financial Services, LLC
 CSE
 CSE Insurance Group
 CS Marketing
 Cultur, LLC
 CUNA Mutual Group
 Dairyland
 Dairyland County Mutual Co of TX
 Dairyland Insurance
 Dakota Fire
 Dashers
 Datalot
 DataMax
 Dean Health
 Debt.com
 Deerbrook
 Delphi Financial
 Delta Auto Assurance
 Delta Auto Protect
 Dempsey Advisor
 DentalInsurance.com
 Depositors Emcasc
 Design Benefit Plans

Diablo Media
 Differential Consulting LLC
 Digiline Media
 Digital BGA
 Digital DBA
 Digital Marketing Connection
 Digital Market Media
 Digital Market Media, Inc.
 Digital Media Solutions
 Digital Thrive
 DIQ Partners
 Direct Auto
 Direct Choice
 Direct General
 DirectMail.com
 Direct Property & Casualty
 Direct Ring Media
 Direct Web Advertising
 Disability Advisor
 Discount Insurance Quotes
 Dixie
 Dobak Holdings LLC
 Doc Auto
 Doc Auto Insurance
 Doc Insurance
 Docktors
 DoublePositive
 Dozer Health
 Draper Agency
 Drips
 Drivers Protection, LLC
 Drobu
 DTRIC
 Eagle Health
 eAmerifamily
 East Coast Health Insurance
 EasyHealth Insurance Services
 easyMedicare.com, an affiliate of e-TeleQuote
 Insurance, Inc.
 EasyMedicare.com, an affiliate of e-TeleQuote
 Insurance, Inc
 Ebco General
 EC Insurance
 Economy Fire & Casualty
 Economy Preferred
 EDeals Inc
 Efinancial
 Egis Auto
 eHealth
 eHealth Insurance
 eHealth Insurance Services
 eHealthInsurance Services
 eHealthInsurance Services, Inc.
 Elderplan
 Electric
 Electric Insurance
 Elephant
 Elite Health Agency
 Elite Health Plus
 eMarketing Media Group
 EmblemHealth
 EMC
 Empire
 Empire Consumer Services
 Empire Health Consultants
 Empire Health Solutions
 Employers Fire
 Empower Brokerage
 Encompass
 Endurance Warranty Servcies
 Enhance Insurance LLC
 EnQue Solutions LLC
 Enrollment Services Inc.
 Ensure
 Ensurem
 EPath
 EPIQ
 Epiq Insurance
 Equis Financial
 Equitable Life
 Equita Group
 Equita Group Final Expense Services
 Erie
 Erie Insurance Company
 Erie Insurance Exchange
 Erie Insurance Group
 Erie Insurance Property and Casualty
 ESG Insurance LLC
 Essential Group LLC
 Essential Group, LLC
 Esurance
 e-Telequote
 ETHOS
 ETN America Health
 Even Financial
 Everest Financial & Insurance Services
 Everquote
 EverQuote, Inc
 EverQuote, Inc.
 EverQuote ODA
 Every Choice Insurance
 Exact Match Media
 Excel Impact
 Excel Impact, LLC
 Excelium Group
 Excella Benefits, Inc.
 Excelling, Inc.
 Excellus
 Exclusive Digital Media
 Explorer
 Ezhealthapplcom, Inc.
 Fabric
 Facility
 Fallon Community Health Plan
 Family First
 Family First Insurance Advisors
 Family First Insurance Advisors LLC
 Family First Life
 Family Health First
 Family Health First LLC
 Family Heritage Life Insurance Company of
 America
 Family Life
 Family/Rural
 Farber Health Advisors
 Farm and Ranch
 Farm Bureau
 Farm Bureau/Farm
 Farm Bureau Financial Services
 Farmers
 Farmers Bank of Kansas City
 Farmers Insurance
 Farmers Insurance Exchange
 Farmers TX County Mutual
 Farmers Union
 Farmland
 Federal
 Federated

Federated American
Federated Group
FERENCE Insurance Agency
Festive Health
FFL
Fidelis
Fidelity and Guaranty Life
Fidelity Insurance Company
Fidelity Investments Life
Fidelity Life
Fidelity National
Fidelity Security Life
Figure Lending LLC
Finalexperienceassistant.com
Final Expense Connect
FinanceBox.com
Financial Indemnity
Find Me Health Insurance
Fiorella
Fiorella Insurance Agency
Fire and Casualty Insurance Co of CT
Fireman's Fund
Firemans Fund
First Acceptance Insurance
First American
First American Financial
First Choice Group
First Choice Health
First Family Insurance
First Family Insurance Advisors
First Family Life
First Financial
First General
First Mutual Insurance Group (FMIG)
First National
First Option Health Group
First Preferred Insurance
FirstQuoteHealth.com
Flexquote
Florida Blue
Florida Plan Advisors
Flynn Financial Co
Ford Motor Credit
Forefront Insurance
Foremost
Foremost Insurance
Foresters
Forethought
Formula Marketing & Analytics
Formza
Formza, LLC
Fortegra
Fortegra Insurance
Fortegra Personal Insurance Agency
Fortis
Franklin
Freedom Debt Relief
Freedom health
Freedom National
Freeway
Freeway Insurance
Freeway Insurance Services
Fresh Leads
Fuego Leads
Gainsco
Garland Financial Group
Gaurantee Trust Life
Geber Life
GEICO

Geico Casualty
Geico General Insurance
Geico Indemnity
Geisinger
Geisinger Insurance
Generation Life
Generation Life Insurance
Genworth
Genworth Financial
Gerber
Gerber Life
GetAuto
GetInsured
Getmehealthcare
GetMe Healthcare
GetMeHealthCare.com
GetMeHealthInsurance.com
Get My Life Insured
Get Seen Media
Get Seen Media Group
GHI
Global Equity Finance
Globe Life
Globe Life Insurance Company
Globe Life Insurance Company of New York
GMAC Insurance
GMAC/NGIC
Go Direct Lead Gen
Go Direct Lead Generation, LLC
GoDirect Leads Generation
GoHealth
GoHealth.com
GoHealthInsurance
GoHealthInsurance.com
GoHealth/Norvax
Goji
Golden Care
Golden Rule
Golden Rule Insurance
Golden Rule Insurance Co.
GoMedicare
goMedigap
Good2Go Insurance, Inc.
GotQuotes
Government Employees
Government Employees Insurance
Government Personnel Mutual Life
Grange
Gr Consulting Services
GreatAmerican
Great American
Great Way
Great West
Greene
GRE Harleysville H
GreyPeaks
Grey Peaks
Grinnell Mutual
Group Health Incorporated
Groves Capital, Inc
Guaranteed Benefits
Guaranteed Health
Guaranteed Health Options
Guarantee Trust Life
Guaranty National
Guaranty National Insurance
Guardian
Guardian Healthcare
Guardian Life

Guide One
Guide One Insurance
GuidePointe Solutions
Guide to Insure
Gupta Insurance & Financial Service
Halcyon
Hannigan Insurance
Hanover
Hanover Lloyd's Insurance Company
HAP Health Alliance
Happy Days
Harbor Health Advisors
Hartford
Hartford AARP
Hartford Accident and Indemnity
Hartford Casualty Insurance
Hartford Fire & Casualty
Hartford Fire Insurance
Hartford Insurance Co of Illinois
Hartford Insurance Co of the Southeast
Hartford Life
Hartford Omni
Hartford Underwriters Insurance
Harvard Commonwealth Health Plan
Harvard Pilgrim
Haven Life
Hawaii Medical Services Association
Hawkeye Security
HCC Insurance holdings
Health Insurance.com
Health Advisors
Health America
Health and Life Associates
Health and Life Plans of America
Health Benefit Center
Health Benefits Center
Health Benefits Direct
Health Benefits One
Health Caddies
Healthcare Advisors
HealthCare Alternatives
Healthcareassistant.com
Healthcare.com
HealthCare.com Insurance Services
Healthcare Direct
HealthCare, Inc.
Healthcare Marketplace
Health Care Service Corp.
Health Care Solutions
HealthCare Solutions
Healthcare Solutions Team
Health Center Marketing
Health Choice One
HealthCompare
HealthCompare Insurance Services, Inc.
Health Connect Insurance
Health Corp USA
HealtheDeals
Health eDeals
Health Exchange Agency
Health First Insurance Agency
Health First Plans
Health Heritage Advisors
Health Insurance Advantage
Health Insurance Advisors
Health Insurance Alliance
Health Insurance Alliance, LLC
Health Insurance for Everyone
Health Insurance Guide

Health Insurance Innovations
Health Insurance Innovations (HII)
HealthInsurance.net
Health Insurance of America
Health Insurance Services
Health Insurance Specialists
HealthIQ
Health IQ
Health I.Q.
Health & Life Advantage
Healthline Care
HealthMarkets
Health Markets
HealthMarkets Insphere
HealthMarkets / Insphere
HealthMarkets Insurance Agency
HealthMatchup
HealthNet
Health Net
Health Network
Health Now New York Inc.
Health Option One
Health Options Team
HealthPartners
Health Partners of Philadelphia Inc.
HealthPlan Advisors
HealthPlanMatchup
HealthPlanOne
Health Plan One
HealthPlan One
HealthPlanOne, LLC
Healthplan Outlook
Health Plans America
Health Plan Services
Health Plans of America
Health Plus
Health Plus of America
HealthPlus of Michigan
Health Plus Solutions
HealthPocket
Health Pocket
HealthPros
Health Providers of America
HealthQuoteInfo.com
Health Savings Group
HealthShare America
HealthShare American
Health Sherpa
Health Solutions One
Healthspire
HealthSpring
Health Team One
Health Works Agency LLCHealthInsurance.com
Healthy Halo
Heard and Smith
Helmkin Digital
Henry Ford Health System
Heritage
Heritage Health Advisors
Heritage Life Insurance Company
HHA
HIA
HiegPartners
Hieg Partners LLC
Highland Health Direct
Highland Health Direct, LLC.
Highmark
Highmark BCBS
HighPoint

High Quality Vehicle Protection
HII
HIIQ
HIP Health Plan
HIP Insurance
Hippo
Hippo Insurance
Hiscox
H&M Advisors
HolaDoctor
Hola Doctor
Homeinsurance.com
Home Insurance King
Homeland Health
Homeland HealthCare
Home Savings
Home Service Companies
Hometown
Hometown Quotes
Home Town Quotes
Horace Mann
Horace Mann Agency
Horizon
Horizon Health Advisors
Hospital Services Association of NEPA
Houstons Health Solutions
How to Enroll
HPO
HSO
HST
HST Enrollment Center
Humana
HyperTarget
Hypertarget Marketing
IAB
iCan Benefit
iCan Benefit Group
Iconic Consultants
ICW
Ideal Concepts
Ideal Concepts, Inc
Ideal Health Benefits
IDS
IFA Auto Insurance
IFA Insurance Company
iFlourish Labs
iFuze Marketing
IGF Ins.
IGF Insurance
Ignitist
IHC
IHC Group
IHC Health Plans
IIS Insurance
iLegacy Insurance
iLife
I Life And Health
IMO
Impact Energy
Impact Media
Imperial Health Group
Imperium Financials
Inavision
Inboxed LLC.
Inc
Independence Blue Cross
Independent Agent
Independent Carriers
Independent Health Association

Independent Health Solutions
Independent Insurance Consultants
Individual Insurance Agencies
Infinity
Infinity Insurance
Infinity National Insurance
Infinity Select Insurance
Infinix
Infinix Media
ING
ING US Life
Innovate Financial Group
Innovation Direct Group
Innovation Group of South Florida
Innovative Financial Group
Innovative Health Group
Innovative Insurance Brokers
Inquire Media
Inside Response
Insphere
Insphere Insurance Solutions
InsuraMatch
Insurance311
Insurance Benefits
Insurance Care Direct
Insurance Central
Insurance.com
Insurance Insight
Insurance Lead Broker, ILB
Insurance Leads
InsuranceLeads.com
Insurance Line One
Insurance Made Easy
Insurance Management Associates
Insurance Medics
Insurance Office of America
InsuranceOnly
InsuranceProz
Insurancequotes
insuranceQuotes.com
InsuranceQuotes, Inc.
Insurance Quotes Now
Insurance Services
Insurance Solutions Direct
Insurance Solutions LLC
InsuranceStep.com
Insure Choice LLC
Insure.com
Insured Street
InsureMe
InsureMe, Inc
Insurify
Insurita
Insur. of Evanston
InsWeb
Integon
Integrated Benefits
Integrated Insurance Solutions
Integriant Ventures Insurance Services
Integrity Health One
Integrity Vehicle Services
IntelliQuote
Interstate
Interstate Brokers of America
Inter Valley Health Plan
Investors Life
IPA Agents
IPA Direct
IPA Family

iQuoteX
 iWebQuotes
 Jackson National Life
 J and L Consulting Group
 Javier Molina Agency
 JB Health and Associates
 JCG New Media
 Jet Media
 JLS
 John Deere
 John Hancock
 Joshua Katyl Allstate
 Joyce Emig Insurance Agency Inc
 JRC Insurance Group
 JSH Marketing
 Jupiter
 Justified Medical Group
 Kaiser
 Kaiser Foundation Health Plan
 Kaiser Foundation Health Plan, Inc.
 Kaiser Foundation Health Plan of Colorado
 Kaiser Foundation Health Plan of Georgia, Inc.
 Kaiser Foundation Health Plan of the Mid-Atlantic
 States, Inc.
 Kaiser Foundation Health Plan of the Northwest
 Kaiser Foundation Health Plan of Washington
 Kaiser Permanente
 Kanopy
 Kanopy Insurance
 Kanopy Insurance Center LLC
 Keenan Associates
 Kelly Klee Private Insurance
 Kelsey-Seybold
 Kemper
 Kemper Lloyds Insurance
 Kentucky Central
 KERWYN JONES
 Key Insurance Advisors
 Keystone
 K.F. Agency, Inc.
 Kin
 Kind Health
 Kin Insurance
 Knights of Columbus
 Koenig Quotes
 Kolor Marketing
 Komparison
 Landmark American Insurance
 Lands Health
 Laser Marketing
 LBCOT Insurance
 Leadco
 LeadEnvoy
 Leader General
 Leader Insurance
 Leader National
 Leader National Insurance
 Leader Preferred Insurance
 Leader Specialty Insurance
 Lead Foundations
 Lead Gate Media GmbH
 Lead Genesis
 Lead Giant
 Leading Healthcare
 Leadnomics
 Lead Origins
 Leads Interactive
 Lead Trust Media Group
 League General
 Legacy Insurance Solutions
 Legal & General America
 Legends United Insurance Agency, Inc
 Lemonade Insurance
 LendingTree
 Lendivia
 Level One Health Group
 Level Up Funding
 LGA
 Liberty Automobile Protection
 Liberty First Health and Life
 Liberty Health
 Liberty Health Plan
 Liberty Health Professionals
 Liberty Insurance Corp
 Liberty Mutual
 Liberty Mutual Fire Insurance
 Liberty Mutual Insurance
 Liberty Mutual Insurance Company
 Liberty National
 Liberty National Life Insurance Company
 Liberty Northwest
 Liberty Northwest Insurance
 Liberty Northwest Insurance
 LifeInsuranceMatchup
 LifeLine Direct
 LifeQuotes
 Lifetime Healthcare
 Lifetime Medicare Advisors
 LifeVision of America
 LifeWise Health Plan
 Lighthouse
 Lighthouse Insurance
 Lighthouse Insurance Group
 LightHouse Insurance Health
 Lincoln Benefit Life
 Lincoln National
 Lion Insurance Group
 Liz Byrne USHA
 LLC
 LNK Insurance Services
 LoanBright
 LoanDepot.com, LLC, mellohome, and their
 corporate parents, affiliates, and partners
 LoanSnap, Inc
 Lockton Affinity Group
 Longevity Alliance
 Louisiana Health Services
 Loyal American
 LPN
 LQ Digital
 LS Lead Generation
 LTC Financial Partners
 Lumbermens Mutual
 LVOA
 Madera Digital
 Managed Health Inc.
 MAPFRE
 MAPFRE Insurance Company
 MAPFRE Insurance Company of Florida
 MAPFRE U.S.A. Corp. and its affiliates
 Marathon
 Marchex
 Markel American
 Martin Financial
 Martin's Point
 Maryland Casualty
 Massachusetts Mutual
 Massive&Co
 MassMutual

Mass Mutual
MassNexus
Mass Nexus
MatchMedia
Match Media Group
Matrix Direct
Matt Rudolph Insurance
Maxim Strategies
Maxxlocal
Mayberry Advisors Insurance Services
Mayo Lab
MCGP International
McLaren Insurance Solutions
McLaren Insurance Solutions
MedGapDirect
MedGuard Alert, Inc
MediaAlpha
Media Alpha
Media Alpha Exchange
Media Champs
MediaMatchGroup
Media Mix 365
Medica
Medical Card System Inc.
Medical Mutual of Ohio
Medicare10
Medicare10
MedicareAdvantage.com
Medicare Benefits Team
Medicare Connect
Medicare Group USA LLC
Medicare Help Centers
Medicare Providers
MedicareProz
Medicare Solutions
Medigap
Medi-Share
MEGA Life and Health
Mega/Midwest
Mellohome LLC
Memorial Hermann
Mendota
Merastar
Mercury
Mercury Insurance
Mercy
MetLife
Met Life
MetLife Auto and Home
Metromile
Metropolitan Co.
Metropolitan Insurance Co.
Mid Century Insurance
Mid-Continent Casualty
Middlesex Insurance
Midland National
Midland National Life
Midwest Mutual
Mid-West Ntl. Life
Migo Insure
Mikayla Data
Millbank
Millennial Home Lending
Millers Mutual
Milwaukee General
Milwaukee Guardian
Milwaukee Mutual
Minnehoma
Minnesota Mutual

Miro Health Agency
Mission Loans
Mississippi Insurance
Missouri General
MJ Direct
MMI Group
MMM Healthcare Inc.
Mobile Help
Modern Health, LLC
Modern Woodmen of America
Molina
Molina Healthcare Inc.
Montys Health Agency
Mony Group
Mortgage Maven
Mortgage Protection Bureau
Mortgage ProtectionPlus
Mortgage Protection Plus
Morty Inc.
Moss
Moss Affiliate
Moss Affiliate Marketing
Moss Affiliate Marketing Sellers
Motors
Mountain Financial
Mountain Laurel
M Plan Inc.
Mutual Health Partners
Mutual Insurance
Mutual Of Enumclaw
Mutual of New York
Mutual of Omaha
MVA Warranty
MVP
My Health Advisors
My Health Angel
My Health Group
MyHippo
MyInsuranceExpert
My Medicare Ally
National Alliance
National Auto Protection Corp.
National Ben Franklin Insurance
National Better Living Association
National Brokerage
National Brokers of America
National Casualty
National Colonial
National Continental
National Continental Insurance
National Debt Relief
National Disability
National Family Assurance Group, Inc.
National Fire Insurance Company of Hartford
National General
National General Insurance
National General Insurance Company (NGIC)
National Healthcare Market
National Health Connect
National Health Connect, LLC
National Health Hub
National Health Hub, LLC
National Health Insurance
National Health Plans
National Health Plans dba Your Lowest Quote
National Health Solutions
NationalHomeProject
National Income Life Insurance Company
National Indemnity

National Insurance
 National Merit
 National Plan Advisors
 National Repair Solutions
 National Solar Network
 National Surety Corp
 National Union Fire Insurance
 National Union Fire Insurance of LA
 National Union Fire Insurance of PA
 National Vehicle Protection Services, Inc.
 Nation Health Advisors
 Nations Health Group Guide One Insurance
 Nations Insurance Solutions
 Nations Lending
 Nationwide
 Nationwide General Insurance
 Nationwide Health Advisors
 Nationwide Insurance Company
 Nationwide Mutual Fire Insurance
 Nationwide Mutual Insurance
 Nationwide Property and Casualty
 Native Media, LLC
 Nat'l Farmers Union
 Navy Mutual Aid Association
 NCWC
 Neighborhood Health Plan Inc.
 Neilson Financial Services
 Neo Ogilvy
 Nest Insurance Agency
 Net Health Affiliates
 NetQuote
 New Age Health
 New Age Health, Inc.
 New Age Health Solutions, Inc.
 New American Funding
 New England Financial
 New Era
 Newins
 NewQuest
 NewStrata
 New York Life
 New York Life Insurance
 New York Life Insurance Group
 NexLevelDirect
 NextGen
 Next Gen
 Next Gen Leads
 NextGen Leads
 NextGen Leads, LLC
 Nexus Corporation
 Nexus Enterprise Solutions
 NGIC
 NHA
 Nikia Media
 NILCO
 NMP Insurance Services, LLC / NameMyPremium
 Noridian Mutual Insurance Company
 North American
 Northern Capital
 Northern States
 Northland
 North Pacific
 North Pointe
 Northpointe Bank
 North Shore
 Northwestern
 Northwestern Mutual
 Northwestern Mutual Life
 Northwestern Pacific Indemnity

Northwest Pacific
 Norvax
 Norvax, LLC.
 NRG
 NuHealth
 Number One Advertising
 Number One Health
 Number One Health Insurance Agency
 Number One Prospecting
 NuStar Insurance
 Nxtlevel Health
 NxtLevelHealth
 Oak Hill Insurance
 Oak Street Health
 OctaneFire
 Offer Advisors
 Offer Strategy
 Offerweb
 OfferWeb.com
 Official-Auto-Insurance.com
 OHealth Group
 Ohio Casualty
 Ohio National Life
 Ohio Security
 Old Mutual US Life
 Olympia
 Omaha
 Omega Auto Care
 Omni Indemnity
 Omni Insurance
 Omnis Pro Insurance
 ONCOR Insurance Services
 One Health
 OneMain Financial Group, LLC
 One Touch Direct
 Online Insurance Solutions
 Online Insurance Solutions LLC
 Onviant
 Onviant Insurance Agency Inc.
 Onyx Digital Media
 OpenJar
 Open Market Quotes
 Opportunity Financial, LLC
 Optimize.Ad
 Optimum HealthCare
 Oregon Mutual
 Orion Ins.
 Orion Insurance
 Oscar
 OSCAR Health
 Oscar Health Insurance
 Outlook Advisors
 Overflow Works
 Oxford
 Oxford Health Plans
 Oxford Insurance
 Oxford Marketing Partners
 Oxford Marketing Partners, LLC
 Pacificare
 Pacific Benefits Group
 Pacific Benefits Group Northwest
 Pacific Indemnity
 Pacific Insurance
 Pacific Life
 Pacific Life and Annuity
 Pafco
 Pafco General Insurance
 Palisades Media Group
 Palmer Administrative Services

Palmetto Senior Solutions
Palms Health Group
Paloverde
Parachute Insurance Services Corp
Parasol Agents Network
Parasol Leads
Parasol Leads, Inc.
Path IQ
Patriot General
Patriot General Insurance
Pay Per Call Market
Peace of Mind Solutions
Peak Advertising
Peak Property and Casualty Insurance
Peak Protection Group
PEMCO
PEMCO Insurance
Penn America
Penn Mutual
Pennsylvania Natl
PennyMac Loan Services, LLC
PFP
Phoenix
Phoenix Life
Physicians Health Plan
Physicians Life
Physicians Mutual
Physicians United Plan
Pickett Group/TermLifeMatch
PickMedicare
Pier21 Media
Pietro Ancona
Ping Leads
Pinnacle
Pinney Insurance Center, Inc.
Pioneer Life
Pivot
Pivotal Concepts
Pivot Health
PJP Agency
PJP Health
PJP Health Agency
Plasmid Direct
Plasmid Media, LLC
Platform Advertising
Platinum Health Advisors
Platinum Health One
Platinum Health Solutions
Platinum Leads
Plymouth Rock
PMIC
PolicyBind, LLC
PolicyFuel
Policy Fuel LLC
Policy Impact LLC
Policy Ninja
Policy Post
PolicyScout
Policy Scout
Ponto Insurance
Powderhorn Media
Precise
Precise Health Insurance Advisors
Precise Leads
Precise Solutions Group
Precision Health
Precision Health Associates
Precursor Media
Preferred Abstainers

Preferred Care
Preferred Health Advisors
Preferred Mutual
Premera Blue Cross
Premier
Premier Business Solutions
Premier Disability
Premier Financial Alliance
Premier Health Association
Premier Health Choice
Premier Health Solutions
Premier Insurance Benefits, LLC
Premium Marketing
Premium Precision Marketing
Presbyterian Healthcare Services
Presbyterian Health Plan
Presidio
Presidio Interactive
Presidio Interactive Corporation
Prestige
Primary Health Care
Primary Insurance Group
Prime Care
Prime Care Health
Prime Healthcare Benefits
Prime Marketcare One
Primerica
Principal
Principal Financial
Principal Life
Priority Health
Priority Insurance
Priority One Health
Pristine
Pristine Media Group
Prodigy Health Agency
Prodigy Health Group
Professional Consultant Insurance Solutions
Progressive
Progressive Auto Pro
Progressive Insurance
Progressive Motorcycle
Prokey Wiseley Hamill
Propath Media
Prospect America Media, LLC
Prosperity Health
Prosurity
Protech Vehicle Services LLC
Protecta America
Protect America
Protective Casualty
Protective Life
ProtectMyCar
Protect My Car
Protect Your Home
Providence
Providence Health Plan
Providence Media Group
Provident
Prudential
Prudential Insurance Co.
Prudential of America
PURE
Puritan Health
Purple Dog Marketing LLC
Pyramid Life
Q3MInsuranceSolutions
Q3M Insurance Solutions, LLC
Qatalyst

QHS
 Quality Healthcare Solutions
 Quality
 Quality Health
 Quality Healthcare Solutions
 Quality Healthcare Solutions, Inc.
 Quality Insurance Solutions
 Quantum3media
 Quantum 3 Media
 Quantum Research
 QuickHealthInsurance.com
 QuickInsured
 Quick Life Center, LLC
 Quick Quote
 Quinstreet
 QuinStreet
 Quote.com
 Quote Engine
 Quotehound
 Quotelab
 QuoteLab, LLC
 QuoteManage LLC
 Quote Manager LLC
 QuoteManager LLC
 Quote Selection
 Quote Selection Insurance Services, Inc
 Quotestorm
 Quote Velocity
 QuoteWhiz
 QuoteWhiz, LLC
 QuoteWizard
 Quote Wizard
 Quotivia
 Radwan Financial
 Ralph Perez Insurance
 Ramsey
 Ranger
 Rank Media
 Rank Media Agency
 RateForce
 RBC Liberty Insurance
 RCPT2
 Real-Comp Data and Marketing
 Reali Loans, Inc.
 Real Results
 Red Auto Protection
 RedVentures
 Redwing Consulting Services LLC
 Reel Media Ventures
 Regal
 Regence
 Reliance
 Reliance First Capital, LLC
 Reliance Insurance
 Reliance National Indemnity
 Reliance National Insurance
 Reliant
 ReliaQuote
 Renaissance Health Services Corp.
 Renew.com
 Renew.com Inc.
 Republic Indemnity
 Reserve Compass LLC
 Resource Connect
 Response Insurance
 Retirement Solution Leaders
 Revi Media
 Rev Impact
 RevPoint
 RevPoint Media
 Rex Direct
 RGAX
 Right Advisors LLC
 Ring Latino
 Ring Router
 Rocket Health Insurance
 Rocket Health, LLC
 Rocket Mortgage
 Rockford Mutual
 Rocking Ham Group
 Rodney D. Young
 Root
 Royal United
 RP Marketing
 RSA
 SafeAuto
 Safe Auto
 Safeco
 Safeguard
 Safeway
 Safeway Insurance
 Safeway Insurance Co of AL
 Safeway Insurance Co of GA
 Safeway Insurance Co of LA
 Sagicor
 Sales Data Pro
 SalesHammer
 SalesRadix
 SaveToday
 Savings Bank Life Insurance Company of
 Massachusetts (SBLI)
 Savings Bank Life Insurance Company of
 Massachusetts (SBLI) Scan Health Plan
 S.B. Fintech Ltd
 Scan Health Plan
 SCMS
 Scott and White
 Sea West Insurance
 Secura
 Secure Car Care
 Secured Health
 Secure Horizons
 Security Health Plan of Wisconsin Inc.
 Security Insurance
 Security Insurance Co of Hartford
 Security National
 Security National Insurance Co of FL
 Sedgwick James
 SelectHealth
 Selective Healthcare
 SelectMyPolicy.com
 SelectQuote
 Select Quote
 SelectQuote A&H;
 SelectQuote Auto & Home
 SelectQuote Insurance Services
 SelectQuote Life
 Select Quote Senior
 SelectQuote Senior
 Self Financial
 SeniorCare Benefits
 Senior Coverage
 Senior Direct Insurance
 Senior Healthcare Advisors
 Senior Healthcare Direct
 Senior Health Connect
 Senior Health Connect Insurance Agency
 Senior Health Direct

Senior Life
 Senior Life Insurance Company
 Senior Life Services
 Senior Market
 Senior Market Advisors
 Senior Market Partners
 Senior Market Quotes
 Senior Market Sales
 SeniorQuote Insurance Services
 Sentara Health Management
 Sentinel Insurance
 Sentry
 Sentry Group
 Sentry Insurance a Mutual Company
 Sentry Insurance Company
 Sentry Insurance Group
 Serenity
 Shelter Insurance
 Shelter Insurance Co.
 Shelter Insurance Company
 Shop RX Plans
 Shore Life and Retirement Agency
 Sicuro Health LLC
 Sierra Health Services
 Silent Affiliates
 Simple Health
 Simple Health Plans
 Simple Insurance
 Skandia TIG Tita
 Smart Care Direct
 Smart Final Expense
 Smart Health Options, LLC
 Smart Match Insurance Agency
 Smart Match Insurance Solutions
 Smart Relief Rx
 SmartScripts & Affiliates
 SmartScripts Agents
 Smedley Insurance Group
 Solar City
 Solar Research Group
 Solar Savings America
 SolidQuote
 SolidQuote LLC
 SolidQuote, LLC
 Spectrum Direct
 Spectrum Health
 Spring EQ LLC
 Spring Health Plans
 Spring Insurance
 Spring Insurance Solutions
 Spring Venture
 Spring Venture Group
 Stancorp Financial
 Standard Guaranty
 State and County Mutual Fire Insurance
 State Auto
 State Farm
 State Farm County
 State Farm Fire and Cas
 State Farm General
 State Farm Indemnity
 State Farm Insurance Co.
 State Farm Lloyds Tx
 State Farm Mutual Auto
 State Fund
 State Mutual
 State National
 State National Insurance
 Sterling

Sterling Senior Health
 Stevens Insurance Agency
 Stone Hill National
 Stone Tapert
 StoneTapert Employee Benefits
 Stone Tapert Insurance Services
 StoneTapert Insurance Services Inc
 St. Paul Companies
 Strategy Bay
 Stratum Media DMCC
 Stringbit
 STRINGBIT inc.
 Success Mortgage Partners, Inc.
 Suited Connector
 SummaCare
 Summit direct mail
 Summit Health
 Sun Coast
 Sun Edison
 Sun Life Assurance Company
 Sun Power
 SunPro Solar
 Sunrise Health
 Sunrun
 Superior American Insurance
 Superior Global Marketing Inc.
 Superior Guaranty Insurance
 Superior Home
 Superior Insurance
 Support First
 Supreme Health Options, Inc.
 Sureco
 Sureco Legacy Insurance Services, Inc
 Sure Health Plans
 SureHits
 Suretouch Leads
 Sutter
 SVG
 Swiss Re
 Symmetry Financial Group
 Synergy Insurance
 Synergy Insurance Marketing
 Synergy Marketing Associates Inc
 Tapert Insurance Agency Inc
 Taylor & Associates
 Taylored Legacy
 Tech Insurance
 Tech Leads
 Teran Marketing
 TGC Health, LLC
 The Commerce Insurance Company
 The Complete Lead
 The Credo Group
 The General
 The Hartford
 The Hartford AARP
 The Healthcare Assistant
 Thehealthcareassistant.com
 The HealthScout
 The Insurance Center
 The Lead Company
 The Lead Giant
 The McGrp International
 Themedicareassistant.com
 The Rindal Agency
 The Senior Resource Group
 The-Solar-Project.com
 The Zebra
 This or ThatMedia

This or That Media
This or That Media Inc.
Three Rivers Holdings
Thrivent Financial for Lutherans
TIAA-CREF
Tiburon Insurance
Tiburon Insurance Services
TICO Insurance
TIG Countrywide Insurance
Tiger Health Solutions
Titan
Titan Indemnity
TK Insurance Services Inc
Tobias and Associates
Tobias & Associates
Together Health
Toggle
Top Flite
Top Healthcare Options
Torchlight
Torchlight Technology
Torchmark
Torr
Total
Total Advocacy Group LLC
Total Insurance Brokers
Touchstone
Tower
Towers Watson dba OneExchange
TPG Direct
Trademarc
Trademarc Global LLC
TradeMarc Global, LLC
Traders Insurance
Traffic Tree LLC
Transamerica
Trans America
Tranzact
Tranzact Insurance Solutions
Travelers
Travelers Indemnity
Travelers Insurance
Travelers Insurance Company
Trinity Universal
Triple-S Inc.
TriState
Tri-State Consumer
Tri-State Consumer Insurance
TruBridge
TruBridge, Inc
TruBridge, Inc.
True Auto
TrueChoice Insurance Services
Truecoverage
True Coverage
Trusource
TruSource
Tru Source
TruSource Marketing
TruStage
TrustedConsumer
Trusted Consumer Advisors
TrustedConsumer LLC
Trust Hall
Tryton
TSC Insurance
Tufts
Tufts Associates HMO Inc.
Tufts Health Plan

Twentieth Century
TWG
Twin City Fire Insurance
TZ Insurance Solutions
TZ Insurance Solutions LLC
Ucare
UMA
Underground Elephant
UniCare
Uniguard
Union
Unique Q2B
United Advisors LLC
United American/Farm and Ranch
United American Insurance Company
United Enrollment
United Financial
United Fire & Casual
United Health
UnitedHealthcare
United Healthcare
United Healthcare Advisors
UnitedHealthcare/UnitedHealthOne
UnitedHealthOne
United Insurance
United Insurance Group Agency, Inc.
United Medicare
United Medicare Advisors
United of Omaha
United Pacific Insurance
United Repair Programs
United Security
United Services Automobile Association
United States Fidelity
Unitrin
Unitrin Direct
Unitrin Inc.
Universal American
Universal American Financial Corp.
Universal Health Advisors
Universal Health Care
UniversalHealthcareAdvisors
Universal Healthcare Advisors
Universal Underwriters Insurance
University Health Care Inc.
Unsure
UnumProvident Corp.
Upfront
UPMC
UPMC Health System
USAA
USA Benefits/Continental General
USA Dental Club
US Benefit Solutions
USDS (US Dealer Services)
USF and G
USF&G;
U S Financial
US Financial
US Financial Life
US Health Advisors
USHealth Advisors
US Health Group
USHEALTH Group
USInsuranceOnline
US Saving Center
US Web Leads
Utah Home and Fire
Utica

Valley Peak Insurance Group
Vanguard Health Ventures
Vantis Life
Vasa North Atlantic
Vehicle Assurance Co
Velapoint
VelaPoint Personal Insurance
Verengo
Verified Insurance Lead
Versible Connect
Versus Media Group
Verti Insurance
Verti Insurance Company
Veterans United Home Loans
Vigilant
Viking
Viking County Mutual Insurance
Viking Insurance Co of WI
VIMO
Visiqua
Visiqua LLC
Vitalone
Vitalone Health
Vital One Health
VitalOne Health Plans
Vital One Health Plans Direct, LLC
Viva Health
VSC Digital
VSC Group
Walking Tree Creative LLC
Warranty Agents
Warranty Direct
Wasatch Marketing Group
Washington National Life
Washington United LLC
Wawaunesa
Wax Digital Solutions
WEA Inc.
WebTec
we-Call Media
Wejo
Wellcare
WellCare Health Plans
Wellington
Wellness Plan of America
WellPoint
We Speak
West American
West Bend Mutual
Westcoast Closers
West Coast Closers
Western and Southern Life
Western Mutual
Western National
Western & Southern Financial
Western & Southern Life
Westfield
West Field
West Plains
Wholesale
Whoop Media
William Penn
Windhaven
Windsor
Windsor Insurance
Windstar
Wisconsin Mutual
Woodlands Financial Group
World Insurance

World Mail Direct USA
World of Insurance
Worldwide
Wyndham Capital Mortgage, Inc
WynnHealth
XLHealth
XLHealth.
Yellow Key
Yosemite
Young Life & Wealth
YourHealthCareQuotes.com
Your Help HQ
Your Lowest Quote
Zander
Zebra
ZebraA1333
Zenith Media
Zillow Home Loans, LLC
Zoom Insurance
ZQ Auto Insurance
ZQ Sales
Zurich
Zurich North America
Zurich North America or other partners